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June 24, 2022

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VIA ECF

Hon. Mary Kay Vyskocil
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street, Room 2230
New York, NY 10007

Re: *Spray Moret, LLC v. Moises Lifshitz, et al.*,
No. 1:22-cv-4043 (MKV) (S.D.N.Y.)

Dear Judge Vyskocil:

We represent Plaintiff Spray Moret, LLC (“Plaintiff”) in the above-captioned matter. We write pursuant to Rule 2.G of Your Honor’s Individual Rules to respectfully request that the Court (i) adjourn the hearing on Plaintiff’s Motion for a Preliminary Injunction [ECF No. 27] recently scheduled for June 30, 2022 [*see* ECF No. 38], until **on or after August 8, 2022**; and (ii) extend the time for all defendants (Moises Lifshitz, Isaac Alejandro Lifshitz Micha, Atmpacks S.A. de C.V., Sprayground S.A. de C.V., International Business Strategy & Consultants, LLC a/k/a American Backpacker, ATM Luggage, Spraygirlofficial, and Javier Mucino; collectively, “Defendants”) to file an answer or otherwise move to **August 8, 2022**.

The reason for the requested adjournment and extension of time is that the undersigned counsel and counsel for Defendants are actively engaged in settlement discussions.

This is Plaintiff’s first request for an adjournment in connection with this hearing. Defendants Moises Lifshitz, Isaac Alejandro Lifshitz Micha, International Business Strategy & Consultants, LLC a/k/a American Backpacker, and Javier Mucino previously requested an extension of time to answer or move on June 14, 2022, which Your Honor granted [ECF No. 41]. No other dates will be affected should the adjournment and extension be granted.

We have conferred with counsel for Defendants, and they consent to the requested adjournment and extension of time.



Hon. Mary Kay Vyskocil
June 24, 2022
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We thank the Court for its attention to these requests.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Brad D. Rose", with a long horizontal flourish extending to the right.

Brad D. Rose

cc: All Counsel of Record (via ECF)

GRANTED. The hearing scheduled for June 30, 2022 is hereby adjourned to August 24, 2022 at 3:00pm. SO ORDERED.

Date: 6/27/2022
New York, New York

A handwritten signature in black ink, appearing to read "Mary Kay Vyskocil", with a long horizontal flourish extending to the right.

Mary Kay Vyskocil
United States District Judge